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Via Electronic Mail

Susan Groves Renton, Esq.
Law Offices of G. Grady Richardson, Jr., P.C.
1908 Eastwood Rd., Suite 224, Lumina Station
Wilmington, NC 28403

Re: Public Records Request to the Town of Wrightsville Beach (ALPR/Flock) — Acknowledgment of Production and Deficiency Notice

Dear Ms. Renton:

Thank you for the Town's August 14 production. I received the twenty-four pages (Bates TOWB 001–024), and I appreciate your office moving the matter to resolution. The Town has now produced its Flock order form and invoice, its written ALPR policy (Policy 5.09), an SBI/DCI access agreement, and a network sharing-features configuration. I note, and credit, that the Town provided GPS coordinates for its cameras — a step no other agency in this records project has taken. Several items I requested on June 30, 2026 remain outstanding, and I write to identify them so the Town can complete its response.

Four items remain unproduced. No responsive files were produced in native CSV, and none has been withheld with a cited statutory basis:

- **The Flock Network Audit** — the log of which outside agencies searched the Town's cameras, and why — generated on demand from the Flock "Insights" tab, for the most recent three complete calendar months, in native CSV. Because a Network Audit for a networked camera can exceed the roughly 1,048,576-row limit of a single spreadsheet — as has happened with peer agencies, whose Excel exports were truncated at that cap — please provide it in native CSV; if the platform will export only to Excel, please break the export into smaller date-range segments so that no rows are lost to truncation.
- **The Flock Organization Audit** — the searches run by the Town's own officers — same period, native CSV.

- **The Event Log** — same period, native CSV.
- **Records of misuse, policy violations, or discipline** related to ALPR use — or a written statement that none exist.

The audit logs are the heart of the request, and they are not burdensome to produce. Each is an existing report the Town generates on demand within the Flock platform; producing it is a format election under N.C. Gen. Stat. § 132-6.2(a), not the creation of a new record. Peer agencies on the same vendor produced these exact exports within days — Kure Beach and Carolina Beach, which received this identical request on the same day, released their audits (naming the agencies that searched their cameras) within roughly six and ten days, respectively.

Governing standard. N.C. Gen. Stat. § 132-6(a) requires production "as promptly as possible," and § 132-6.2(c) requires copies of electronic database records "as soon as reasonably possible." I ask that the Town produce the four items above — or state a specific, item-by-item statutory basis for any withholding — within ten (10) business days. I would gladly accept the audit exports on a rolling basis, and in whatever date-range segments are convenient, if that is faster.

I appreciate the Town's engagement and prefer to close this cooperatively. Should production stall, the remedy remains an action to compel under § 132-9, with costs and reasonable attorneys' fees available under § 132-9(c), and pre-suit mediation under § 7A-38.3E. I do not expect that will be necessary.

Thank you for your attention to this.

Respectfully,

/s/ Mark

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